

CFTC Ex. 535

**DECLARATION UNDER PENALTY OF PERJURY OF  
JOSEPH J. PATRICK PURSUANT TO 28 U.S.C § 1746**

I, Joseph J. Patrick, hereby declare as follows:

1. I am employed with the United States Commodity Futures Trading Commission (“CFTC”) as a Senior Investigator in the Division of Enforcement (“Division”).

2. My primary responsibilities include conducting investigations to determine whether there have been violations of the Commodity Exchange Act and Commission Regulations. In connection with these responsibilities, I analyze bank records, documents related to trading, account opening documents, and customer records for commodity futures, commodity options, swaps, and off-exchange foreign currency (“forex”) accounts; trace the flow of funds through bank, commodity futures, commodity options, and forex trading accounts; review corporate formation documents filed with various state and federal agencies; and review applicable registration information for entities and individuals in the U.S. futures industry, among other activities.

3. From June 1996 to July 2010, I held various regulatory compliance positions at National Futures Association (“NFA”), the independent self-regulatory organization for the U.S. futures industry. In these positions, I was responsible for conducting examinations and investigations of commodities, futures, options and forex trading firms, including performing analyses of trading activity, cash flows, and sales practices and initiating formal disciplinary actions when violations of NFA rules were detected.

4. I received a Bachelor of Science degree in Accounting in 1996 from University of Illinois at Chicago and hold a certification as a Certified Fraud Examiner (CFE).

5. In March 2019, I was assigned to an investigation concerning Long Leaf Trading Group, LLC (“Long Leaf”) and its owners James A. Donelson (“Donelson”) and Timothy Evans

(“Evans”). Among other things, I was assigned to review and summarize trading records of Long Leaf’s retail customers, including without limitation daily trade confirmations, monthly activity statements, and emails between Long Leaf and its customers, in order to determine the total trading losses by customers that agreed to participate in Long Leaf’s “trading program” between June 2015 and December 2019 (“Relevant Period”).

6. To that end, I reviewed trading records produced by Gain Capital Group, LLC (“Gain”), a CFTC registered futures commission merchant (“FCM”) located in Bedminster, New Jersey, and Cunningham Commodities, LLC (“Cunningham”), a CFTC registered FCM located in Chicago, IL. I also reviewed documents and testimony provided by Long Leaf to determine which accounts belonged to customers that participated in the trading program.

7. Truthful and accurate summaries of the foregoing, which I personally prepared, are set forth herein as Exhibit A and include the monthly and cumulative profits and losses (“PNL”) incurred at Gain and Cunningham by Long Leaf customers participating in the trading program. I do not offer any opinion with respect to these records, and I have not made any independent determinations as to whether these the records support inferences which support the CFTC’s claims. The extent of my analysis has been to format, filter, and summarize customer trade data provided by Long Leaf’s FCMs.

**A. Records Reviewed**

8. In April 2019, the National Futures Association (“NFA”), a futures and options industry self-regulatory organization, produced records to the CFTC reflecting that, since September 2019, Long Leaf introduced its customer futures accounts to Cunningham. NFA records produced to the CFTC also reflect that prior to September 2019, Long Leaf introduced accounts to Gain.

9. On May 13, 2019, I issued a request under Section 4g of the Commodity Exchange Act to Gain for, among other items, records regarding the futures and options accounts and trading activity of Long Leaf's customers.

10. As part of Gain's response to the 4g request, Gain produced, in July 2019, a dataset in Excel format containing the customer trading data reflected in the daily activity statements that Gain issued to Long Leaf's customers. The dataset was called Long Leaf Balances.xlsx ("Gain Dataset") and contained more than 325,000 rows of data representing all daily activity statements compiled for Long Leaf customers from January 2014 to December 2018.

11. On May 13, 2019, I issued a request under Section 4g of the Commodity Exchange Act to Cunningham for, among other items, records regarding the futures and options accounts and trading activity of Long Leaf's customers. As part of Cunningham's response to the 4g request, Cunningham produced, in the summer and fall of 2019, a series of Excel files containing customer activity records for all Long Leaf customers for each month from September 2018 through December 2019. The excel files contained over 1,300 rows of data representing all monthly activity statements compiled by Cunningham for Long Leaf customers. I combined the data Cunningham produced in the Excel files into a single dataset. ("Cunningham Dataset").

12. On November 30, 2020, in response to a document request issued by the CFTC, Long Leaf produced an Excel spreadsheet to the CFTC with the filename "Self Directed Traders as of 7262018\_4682365.xlsx" containing the names and account numbers for 40 Long Leaf customer accounts. The document is attached hereto as Exhibit B.

13. During his June 23, 2021 deposition, on pages 130:7 – 131:24, defendant Donelson confirmed that the customer accounts identified in Exhibit B were the only Long Leaf accounts that did not participate in the trading program during the Relevant Period.

14. Using the list of accounts in Exhibit B for reference, I identified and marked each customer account in the Gain and Cunningham Datasets as a) self-directed, or b) a participant in the trading program. I then filtered the results to review only the accounts of customers who participated in the trading program.

**B. Net Losses for Trading Program Participants**

*Profit and Loss at Gain for customers participating in trading program*

15. To determine the PNL, net of all commissions and fees, realized by Long Leaf customers trading at Gain and participating in the trading program during the Relevant Period, I combined the values contained within the Gain dataset in the “OptionPremium”, “Commissions”, “ClearingFees”, “GiveInFees”, “NFAFees”, “TransactionFees”, and “AllOtherFees” fields into a summary field called Net Realized PNL.

16. To confirm the accuracy of the values reflected in the Gain Dataset, on a sample basis, I traced and agreed the values in the columns of the Gain Dataset to the individual monthly customer activity statements produced by Gain during the investigation. I did the same thing with respect to the Net Realized PNL reflected in the Gain Dataset.

17. Based on my review of the Gain Dataset, Long Leaf customer accounts participating in the trading program suffered trading losses at Gain totaling \$4,564,485 during the Relevant Period. *See* Ex. A. 280 of the 285 customer accounts in the Gain Dataset that participated in the Long Leaf trading program during the Relevant Period lost money.

18. Long Leaf's pleadings reflect that Defendant Evans was CEO of Long Leaf from at least June 2015 through November 2017. (Doc. 23, Long Leaf's Ans. ¶¶ 17-18.) \$3,390,407 of the Long Leaf customer losses in the Gain Dataset were incurred during that period. *See* Ex. A. \$1,174,078 of those losses were incurred between December 2017 and September 2018, i.e., when Donelson was CEO but before the switch to Cunningham.

*Profit and Loss at Cunningham for customers participating in trading program*

19. To determine the PNL, net of all commissions and fees, at Cunningham incurred by Long Leaf customers participating in the trading program during the Relevant Period, I combined the values contained within the Cunningham dataset in the "Realized PNL", "Commission", "Clearing Fee", "NFA Fee", and "Transaction Fee" fields into a summary field called Net Realized PNL.

20. To confirm the accuracy of the values reflected in the Cunningham Dataset, on a sample basis, I traced and agreed the values in the columns of the Cunningham Dataset to the individual monthly customer activity statements produced by Cunningham during the investigation. I did the same thing with respect to the Net Realized PNL reflected in the Cunningham Dataset.

21. Based on my review of the Cunningham dataset, Long Leaf customers participating in the trading program suffered losses at Cunningham totaling \$1,202,660 during the Relevant Period. *See* Ex. A. 108 of the 118 customer accounts in the Cunningham Dataset that participated in the trading program during the Relevant Period lost money.

*Total Losses*

22. Overall, Long Leaf customers participating in the trading program lost a combined total of \$5,767,145 at Gain and Cunningham between June 2015 and December 2019. *See* Ex. A. These losses include losses from trading, as well as commissions and fees.

23. \$2,376,738 of the losses occurred when Donelson was CEO. *See* Ex. C.

**C. Commissions Charged by Long Leaf**

*Commissions paid on Gain transactions*

24. During the investigation, Gain produced a document to the CFTC reflecting the commission payments made by Gain to Long Leaf between December 2012 and April 2019. *See* Ex. D. These records reflect that Gain paid a total of \$3,842,619 in commissions to Long Leaf between July 2015 and September 2018.

25. In his June 23, 2021 deposition, on pages 137:20 – 138:1, defendant Donelson stated that 90% of the commission payments made to Long Leaf by Gain were attributable to customers participating in the trading program.

26. Based on defendant Donelson's deposition testimony, I calculated that Long Leaf was paid \$3,458,357 in commissions by Gain for trading by customers participating in the trading program (total Gain commissions paid of \$3,842,619 x 90%).

*Commissions paid to Long Leaf by Cunningham*


27. Defendant Donelson testified in his June 23, 2021 deposition, on pages 131:19 – 131:24, that all Long Leaf customer accounts opened after July 26, 2018 participated in the trading program. Since Cunningham carried Long Leaf customer accounts starting in September 2018 and continuing through December 2019, all Long Leaf customer accounts opened at Cunningham were participants in the trading program.

28. During the investigation, Cunningham produced records reflecting that Long Leaf was paid \$552,637 for customer trading between September 2018 and December 2019. *See* Ex. E.

*Total Commissions*

29. Overall, Long Leaf received a combined total of \$4,010,994 in commission payments from Gain and Cunningham attributable to Long Leaf accounts participating in the trading program during the Relevant Period.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

  
\_\_\_\_\_  
Joseph J. Patrick

Executed on this 3<sup>rd</sup> day of November, 2021, in Chicago, Illinois.



Ex. A

**Long Leaf Trading**  
**Monthly and Cumulative Profits and Losses (PNL)**  
**of Participants in the Trading Program**  
**June 2015 - December 2019**

Year-Month	Monthly PNL at Gain	Monthly PNL at Cunningham	Combined Cumulative Net Realized Profit and Loss
2015-06	(\$82,559.57)		(\$82,559.57)
2015-07	(\$161,229.36)		(\$243,788.93)
2015-08	\$213,899.10		(\$29,889.83)
2015-09	\$178,333.01		\$148,443.18
2015-10	(\$190,308.58)		(\$41,865.40)
2015-11	(\$266,748.45)		(\$308,613.85)
2015-12	(\$250,038.01)		(\$558,651.86)
2016-01	(\$80,719.77)		(\$639,371.63)
2016-02	(\$308,626.59)		(\$947,998.22)
2016-03	\$117,937.05		(\$830,061.17)
2016-04	(\$88,049.76)		(\$918,110.93)
2016-05	(\$84,687.18)		(\$1,002,798.11)
2016-06	\$3,686.30		(\$999,111.81)
2016-07	(\$157,148.64)		(\$1,156,260.45)
2016-08	\$28,231.34		(\$1,128,029.11)
2016-09	\$39,439.47		(\$1,088,589.64)
2016-10	(\$113,608.20)		(\$1,202,197.84)
2016-11	\$51,520.71		(\$1,150,677.13)
2016-12	\$209,409.47		(\$941,267.66)
2017-01	(\$353,768.99)		(\$1,295,036.65)
2017-02	(\$387,681.16)		(\$1,682,717.81)
2017-03	\$159,582.09		(\$1,523,135.72)
2017-04	\$113,329.45		(\$1,409,806.27)
2017-05	(\$549,086.24)		(\$1,958,892.51)
2017-06	\$233,971.83		(\$1,724,920.68)
2017-07	(\$193,385.87)		(\$1,918,306.55)
2017-08	(\$1,217,117.86)		(\$3,135,424.41)
2017-09	\$305,867.87		(\$2,829,556.54)
2017-10	(\$97,655.27)		(\$2,927,211.81)
2017-11	(\$463,194.77)		(\$3,390,406.58)
2017-12	\$50,662.79		(\$3,339,743.79)
2018-01	(\$710,299.72)		(\$4,050,043.51)
2018-02	(\$210,665.91)		(\$4,260,709.42)
2018-03	\$69,714.07		(\$4,190,995.35)
2018-04	(\$343,316.49)		(\$4,534,311.84)
2018-05	(\$16,435.94)		(\$4,550,747.78)
2018-06	(\$44,398.68)		(\$4,595,146.46)

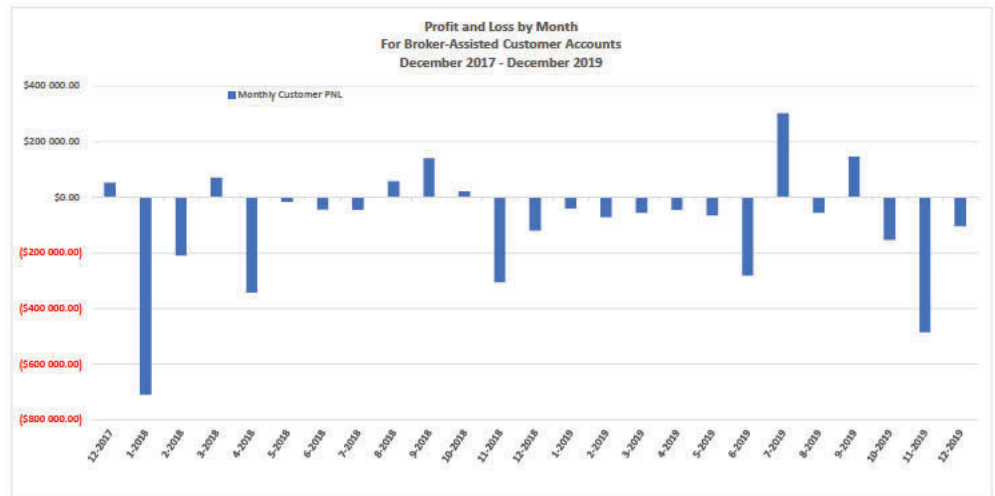
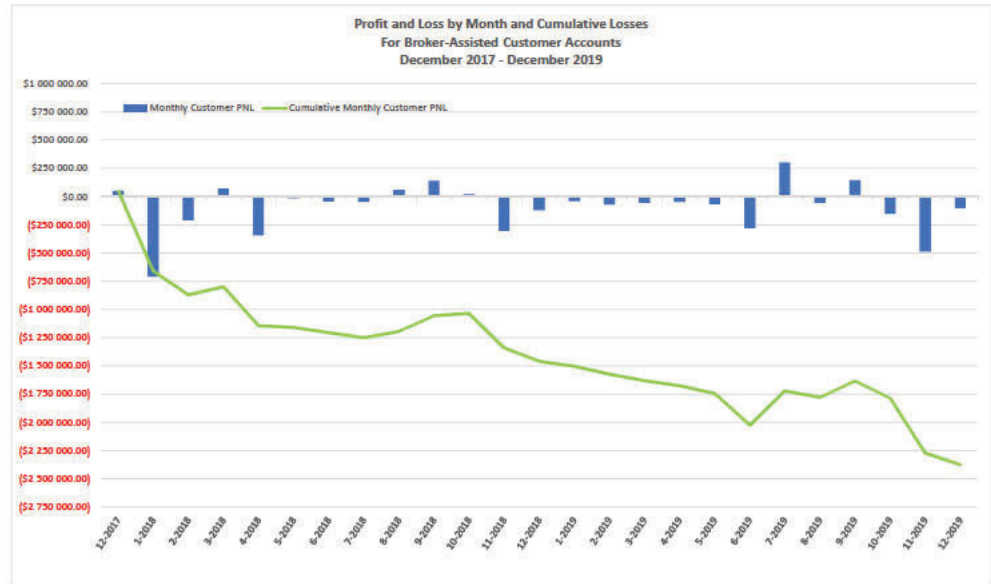
Year-Month	Monthly PNL at Gain	Monthly PNL at Cunningham	Combined Cumulative Net Realized Profit and Loss
2018-07	(\$46,000.72)		(\$4,641,147.18)
2018-08	\$56,799.03		(\$4,584,348.15)
2018-09	\$19,863.26	\$118,489.53	(\$4,445,995.36)
2018-10		\$19,876.92	(\$4,426,118.44)
2018-11		(\$305,473.43)	(\$4,731,591.87)
2018-12		(\$119,988.99)	(\$4,851,580.86)
2019-01		(\$40,968.02)	(\$4,892,548.88)
2019-02		(\$72,530.78)	(\$4,965,079.66)
2019-03		(\$56,411.48)	(\$5,021,491.14)
2019-04		(\$45,604.46)	(\$5,067,095.60)
2019-05		(\$66,668.59)	(\$5,133,764.19)
2019-06		(\$281,247.92)	(\$5,415,012.11)
2019-07		\$301,638.99	(\$5,113,373.12)
2019-08		(\$56,352.49)	(\$5,169,725.61)
2019-09		\$146,099.22	(\$5,023,626.39)
2019-10		(\$153,558.29)	(\$5,177,184.68)
2019-11		(\$485,808.16)	(\$5,662,992.84)
2019-12		(\$104,151.67)	(\$5,767,144.51)
<b>Total PNL</b>	<b>(\$4,564,484.89)</b>	<b>(\$1,202,659.62)</b>	<b>(\$5,767,144.51)</b>

Ex. B

Client	AcctName
	Robert Wershay
	Valas Trading Co
	Simon Chew
	Patrick Meade
	Kevin Gill
	Patsy Luke
	William Kessler
	Adekunle Ogunbadejo
	Brian Ritter
	Scott H. Williams
	Charles L Horn
	David A Kocyba
	Edward John & Sally Ann Zandee
	Shu Lin
	Mill Trust Co Fbo Wilkinson
	Fred R Totzek
	Howard W Brynes
	David J Matulka
	John & Rhonda Boulette
	Donald Q Tran
	Martin & Claudio Behr
	Phoenix Flight Holdings Ltd
	David Cleary
	Amira Damouni
	Arif Basrai
	Seeds Of Nature Llc
	Curtis Partnership
	Mack Oil Company Inc
	Kingdom Trust Fbo Melville
	Thomas D Jackson
	Tareq Shehadeh Fayeq Alansari
	Janine J Cline
	Robert C. Warmington Rev.
	Mazen Alkouatli
	David Schaedtler
	Robert Mcrae
	Curt Rakestraw
	Noah Halfacre
	Daniel Raymond Smith
	Robert and Barbara Diyorio

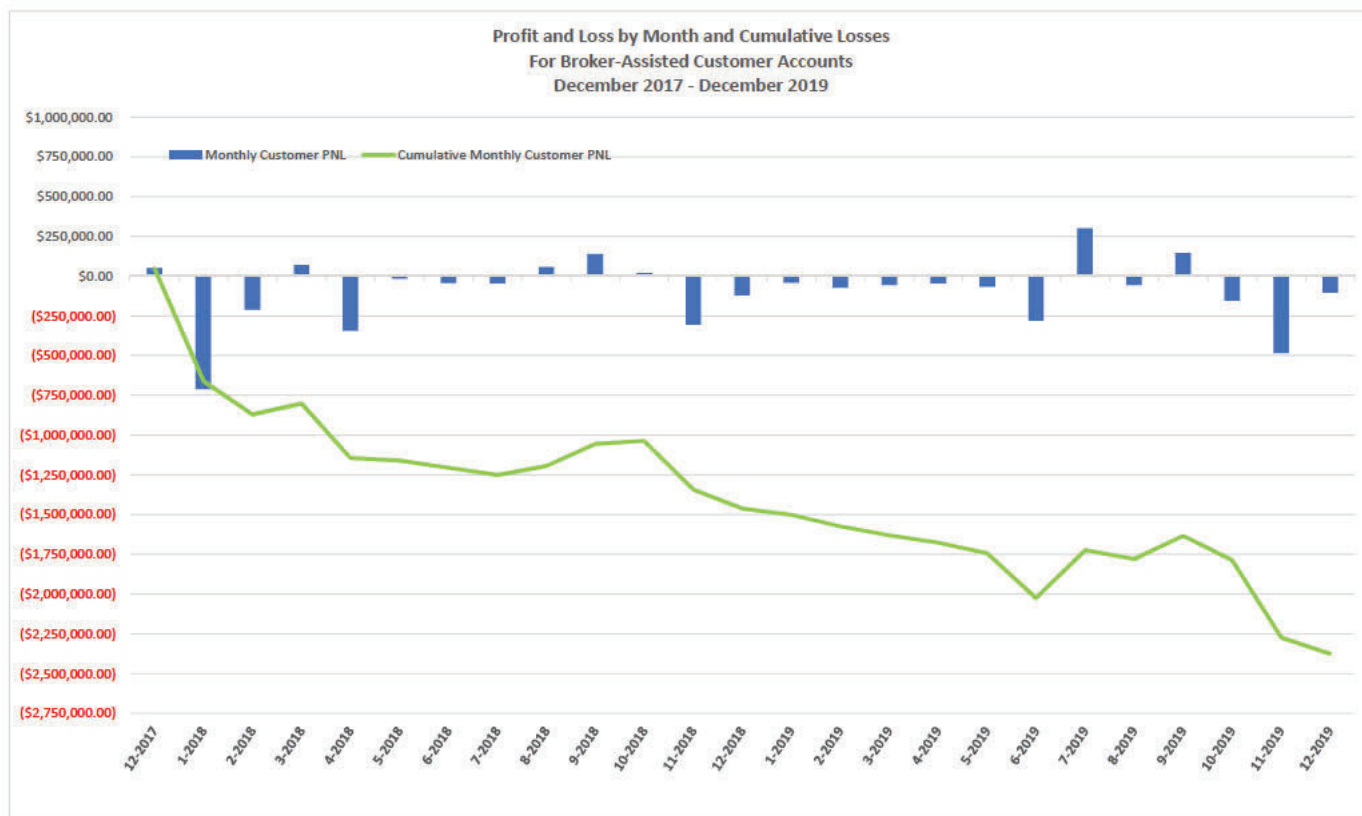

Ex. C

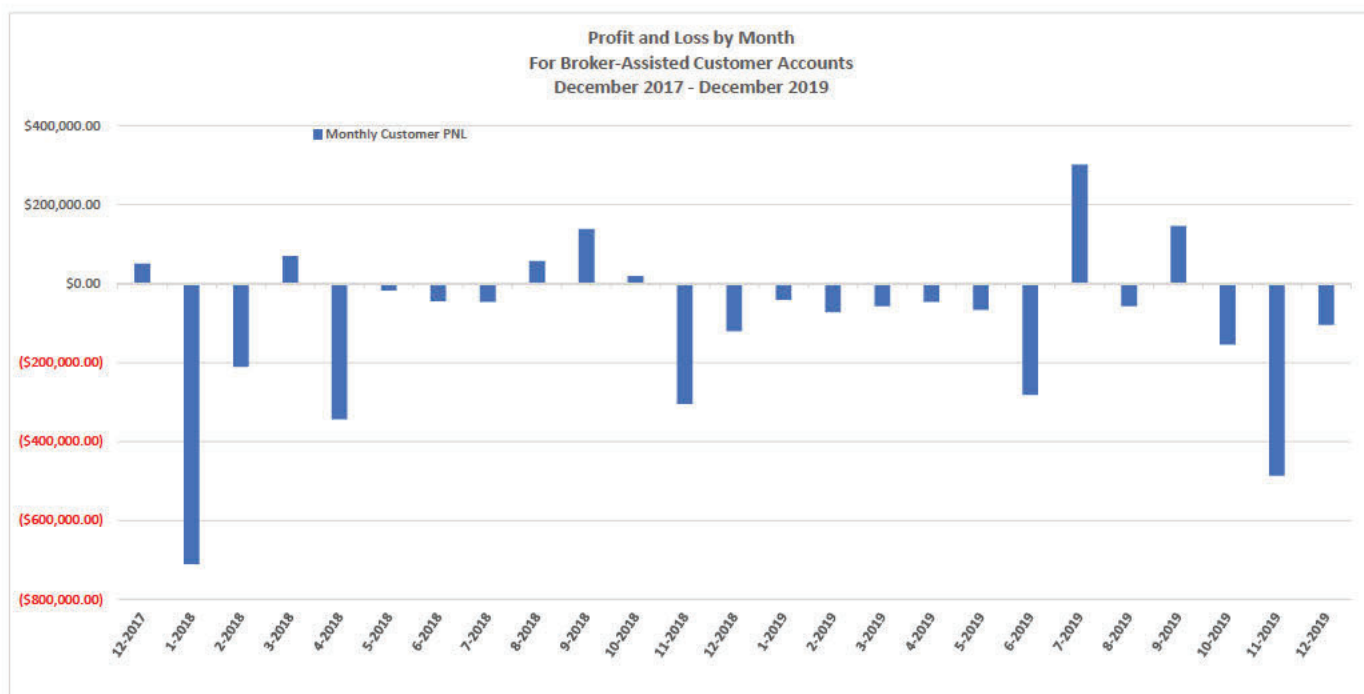
Month End	Monthly Customer PNL	Cumulative Monthly Customer PNL
12-2017	\$50,662.79	\$50,662.79
1-2018	(\$710,299.72)	(\$659,636.93)
2-2018	(\$210,665.91)	(\$870,302.84)
3-2018	\$69,714.07	(\$800,588.77)
4-2018	(\$343,316.49)	(\$1,143,905.26)
5-2018	(\$16,435.94)	(\$1,160,341.20)
6-2018	(\$44,398.68)	(\$1,204,739.88)
7-2018	(\$46,000.72)	(\$1,250,740.60)
8-2018	\$56,799.03	(\$1,193,941.57)
9-2018	\$138,352.79	(\$1,055,588.78)
10-2018	\$19,876.92	(\$1,035,711.86)
11-2018	(\$305,473.43)	(\$1,341,185.29)
12-2018	(\$119,988.99)	(\$1,461,174.28)
1-2019	(\$40,968.02)	(\$1,502,142.30)
2-2019	(\$72,530.78)	(\$1,574,673.08)
3-2019	(\$56,411.48)	(\$1,631,084.56)
4-2019	(\$45,604.46)	(\$1,676,689.02)
5-2019	(\$66,668.59)	(\$1,743,357.61)
6-2019	(\$281,247.92)	(\$2,024,605.53)
7-2019	\$301,638.99	(\$1,722,966.54)
8-2019	(\$56,352.49)	(\$1,779,319.03)
9-2019	\$146,099.22	(\$1,633,219.81)
10-2019	(\$153,558.29)	(\$1,786,778.10)
11-2019	(\$485,808.16)	(\$2,272,586.26)
12-2019	(\$104,151.67)	(\$2,376,737.93)



Month End	Monthly Customer PNL	Cumulative Monthly Customer PNL
12-2017	\$50,662.79	\$50,662.79
1-2018	(\$710,299.72)	(\$659,636.93)
2-2018	(\$210,665.91)	(\$870,302.84)
3-2018	\$69,714.07	(\$800,588.77)
4-2018	(\$343,316.49)	(\$1,143,905.26)
5-2018	(\$16,435.94)	(\$1,160,341.20)
6-2018	(\$44,398.68)	(\$1,204,739.88)
7-2018	(\$46,000.72)	(\$1,250,740.60)
8-2018	\$56,799.03	(\$1,193,941.57)
9-2018	\$138,352.79	(\$1,055,588.78)
10-2018	\$19,876.92	(\$1,035,711.86)
11-2018	(\$305,473.43)	(\$1,341,185.29)
12-2018	(\$119,988.99)	(\$1,461,174.28)
1-2019	(\$40,968.02)	(\$1,502,142.30)
2-2019	(\$72,530.78)	(\$1,574,673.08)
3-2019	(\$56,411.48)	(\$1,631,084.56)
4-2019	(\$45,604.46)	(\$1,676,689.02)
5-2019	(\$66,668.59)	(\$1,743,357.61)
6-2019	(\$281,247.92)	(\$2,024,605.53)
7-2019	\$301,638.99	(\$1,722,966.54)
8-2019	(\$56,352.49)	(\$1,779,319.03)
9-2019	\$146,099.22	(\$1,633,219.81)
10-2019	(\$153,558.29)	(\$1,786,778.10)
11-2019	(\$485,808.16)	(\$2,272,586.26)
12-2019	(\$104,151.67)	(\$2,376,737.93)







Ex. D

## Payments Made to Long Leaf Trading Group Inc. by GAIN Capital Group LLC

Month	Year									
	2012	2013	2014	2015	2016	2017	2018	2019		
Jan	\$ 133.00	\$ 2,986.00	\$ 32,184.00	\$ 81,612.00	\$ 113,617.00	\$ 79,951.00	\$ 76,029.00			
Feb	\$ 105.00	\$ 4,917.00	\$ 39,343.00	\$ 112,240.00	\$ 155,552.00	\$ 68,546.00	\$ 1,765.00			
March	\$ 91.00	\$ 4,636.00	\$ 106,100.00	\$ 93,748.00	\$ 163,237.00	\$ 59,261.00	\$ 1,317.00			
April	\$ 2,785.00	\$ 3,086.00	\$ 347,749.00	\$ 81,729.00	\$ 152,764.00	\$ 102,137.00	\$ 2,105.00			
May	\$ 3,328.00	\$ 4,595.00	\$ 40,768.00	\$ 86,654.00	\$ 152,618.00	\$ 98,776.00				
June	\$ 6,006.00	\$ 3,518.00	\$ 44,627.00	\$ 93,581.00	\$ 169,743.00	\$ 81,151.00				
July	\$ 3,144.00	\$ 4,600.00	\$ 36,988.00	\$ 86,171.00	\$ 141,754.00	\$ 71,318.00				
August	\$ 2,957.00	\$ 9,503.00	\$ 48,694.00	\$ 85,741.00	\$ 138,742.00	\$ 76,027.00				
September	\$ 3,167.00	\$ 22,627.00	\$ 54,540.00	\$ 108,896.00	\$ 118,048.00	\$ 37,000.00				
October	\$ 3,808.00	\$ 31,515.00	\$ 70,568.00	\$ 135,705.00	\$ 59,860.00	\$ -				
November	\$ 12,325.00	\$ 35,885.00	\$ 64,373.00	\$ 123,627.00	\$ 91,651.00	\$ 1,179.00				
December	\$ 49.00	\$ 6,108.00	\$ 37,432.00	\$ 53,744.00	\$ 163,154.00	\$ 84,474.00	\$ 11,453.00			

## Payments Made to:

**Beneficiary** Long Leaf Trading Group, Inc.  
**Account No.** [REDACTED] 6339  
**Bank** JP Morgan Chase Bank, NA  
**ABA** 71000013

Ex. E

## LONG LEAF TRADING

Sep-18

ACCT #	GROSS	TRADES	RATE	CUNN SHR	TRANS FEE	REBATE
LLT-010	1,180.00	56	0.75	-42.00		1,138.00
LLT-017	2,560.00	104	0.75	-78.00		2,482.00
LLT-028	36,070.00	1256	0.75	-942.00		35,128.00
LLT-029	9,640.00	356	0.75	-267.00		9,373.00
LLT-037	2,880.00	120	0.75	-90.00		2,790.00

SEPT CTS FEE	-814.00
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FINAL REBATE	50,097.00
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PROOF	52,330.00	1,892.00
	-1,180.00	-56
	-2,560.00	-104
	-36,070.00	-1256
	-9,640.00	-356
	-2,880.00	-120
	0.00	0.00

Plus Trans fee

Add sept &amp; OCT ON OCT PAYMENT

## LONG LEAF TRADING

Oct-18

Sept

Oct

ACCT #	GROSS	TRADES	RATE	CUNN SHR	TRANS FEE	TRANS FEE	REBATE
LLT-010	1,180.00	56	0.75	-42.00	120.00		1,258.00
LLT-017	2,560.00	104	0.75	-78.00	210.00		2,692.00
LLT-028	36,070.00	1256	0.75	-942.00	2,436.00		37,564.00
LLT-029	9,640.00	356	0.75	-267.00	729.00		10,102.00
LLT-037	2,880.00	120	0.75	-90.00	228.00		3,018.00

SEPT CTS FEE	-814.00
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FINAL REBATE	53,820.00
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PROOF	52,330.00	1,892
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-1,180.00	-56
-2,560.00	-104
-36,070.00	-1,256
-9,640.00	-356
-2,880.00	-120

0.00	0
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Plus Trans fee

Add sept &amp; OCT ON OCT PAYMENT

## LONG LEAF TRADING

ACCT #	Oct-18 GROSS	TRADES	RATE	CUNN SHR	Sept TRANS FEE	Oct TRANS FEE	REBATE
LLT-002	1,440.00	48	0.75	-36.00	0.00	72.00	1,476.00
LLT-010			0.75	0.00	120.00		120.00
LLT-017	6,920.00	264	0.75	-198.00	210.00	549.00	7,481.00
LLT-028			0.75	0.00	2,436.00		2,436.00
LLT-029	85,105.00	3043	0.75	-2,282.25	729.00	6,591.00	90,142.75
LLT-037	3,580.00	157	0.75	-117.75	228.00	354.00	4,044.25
SEPT CTS FEE							-1,420.00
Comm ADJ							
LLT017							-940.00
LLT028							-14,170.00
LLT037							-580.00
FINAL REBATE							88,590.00
					3,723.00		

## LONG LEAF TRADING

Nov-18				NOV		
ACCT #	GROSS	TRADES	RATE	CUNN SHR	TRANS FEE	REBATE
LLT-001	1,300.00	60	0.75	-45.00	130.50	1,385.50
LLT-002	3,160.00	140	0.75	-105.00	358.50	3,413.50
LLT-010			0.75	0.00		0.00
LLT-017	5,760.00	209	0.75	-156.75	472.50	6,075.75
LLT-028	39,582.50	1479	0.75	-1,109.25	4,051.50	42,524.75
LLT-029			0.75	0.00		0.00
LLT-037			0.75	0.00		0.00
LLT-099	3.20	4	0.75	-3.00		0.20
NOV CTS FEE						-1,430.90
ICE FEE - OCT - NOV						-200.00
Comm ADJ	LLT-028					-4,400.00
	LLT-001					-120.00
	LLT-002					-260.00
	LLT-017					-400.00
	LLT-028					-3,740.00
LLT ERROR ACCOUNT HOLDBACK						-6,478.89
FINAL REBATE						36,369.91
						4,882.50

## LONG LEAF TRADING

12/31/18				NOV		
ACCT #	GROSS	TRADES	RATE	CUNN SHR	TRANS FEE	REBATE
LLT-001	945.00	39	0.75	-29.25	328.50	1,244.25
LLT-002	1,200.00	51	0.75	-38.25	318.00	1,479.75
LLT-003	780.00	30	0.75	-22.50	172.50	930.00
LLT-010			0.75	0.00		0.00
LLT-017	1,560.00	57	0.75	-42.75	373.50	1,890.75
LLT-028	70.50	42	0.75	-31.50	63.00	102.00
LLT-029			0.75	0.00		0.00



LLT-037	0.75	0.00	0.00
LLT-099	0.75	0.00	0.00
Comm ADJ			
DEC CTS FEES			-1,285.90
FINAL REBATE			4,360.85
	927.00		

## LONG LEAF TRADING

Jan-19		JAN				
ACCT #	GROSS	TRADES	RATE	CUNN SHR	TRANS FEE	REBATE
LLT-001	5,530.00	234	0.75	-175.50	585.00	5,939.50
LLT-002	4,870.00	201	0.75	-150.75	517.50	5,236.75
LLT-003	4,760.00	181	0.75	-135.75	442.50	5,066.75
LLT-010			0.75	0.00		0.00
LLT-017	7,190.00	265	0.75	-198.75	669.00	7,660.25
LLT-028	0.00	0	0.75	0.00	0.00	0.00
LLT-029			0.75	0.00		0.00
LLT-037			0.75	0.00		0.00
LLT-099			0.75	0.00		0.00

Comm ADJ	LLT002	-80.00
	LLT003	-70.00
	LLT017	-80.00

JAN CTS FEES	0.00
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FINAL REBATE	23,673.25
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**LONG LEAF TRADING**

Feb-19				JAN		
ACCT #	GROSS	TRADES	RATE	CUNN SHR	TRANS FEE	REBATE
LLT-001	5,360.00	268	0.75	-201.00	804.00	5,963.00
LLT-002	4,080.00	204	0.75	-153.00	600.00	4,527.00
LLT-003	4,200.00	210	0.75	-157.50	615.00	4,657.50
LLT-010			0.75	0.00		0.00
LLT-017	6,840.00	342	0.75	-256.50	1,003.50	7,587.00
LLT-028			0.75	0.00		0.00
LLT-029			0.75	0.00		0.00
LLT-037			0.75	0.00		0.00
LLT-099			0.75	0.00		0.00
Comm ADJ ERROR ACCOUNT CREDIT ON 3/4/19						-4,490.00
feb CTS FEES						-1,430.90
w/trf fee - mar 2019						-30.00
FINAL REBATE						16,783.60

**LONG LEAF TRADING**

Mar-19				JAN		
ACCT #	GROSS	TRADES	RATE	CUNN SHR	TRANS FEE	REBATE
LLT-001	8,060.00	403	0.75	-302.25	1,099.50	8,857.25
LLT-002	6,820.00	344	0.75	-258.00	886.50	7,448.50
LLT-003	6,460.00	323	0.75	-242.25	867.00	7,084.75
LLT-010			0.75	0.00		0.00
LLT-017	11,020.00	557	0.75	-417.75	1,419.00	12,021.25
LLT-028			0.75	0.00		0.00
LLT-029			0.75	0.00		0.00
LLT-037			0.75	0.00		0.00
LLT-099			0.75	0.00		0.00

## Comm ADJ ERROR ACCOUNT CREDIT ON 3/4/19

LLT-001	-2,170.00
LLT-002	-40.00
LLT-003	-140.00
LLT-017	-840.00

CTS MONTHLY CHARGE	-1,430.90
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w/trf fee - mar 2019	-30.00
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FINAL REBATE	30,760.85
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## LONG LEAF TRADING

Apr-19

JAN

ACCT #	GROSS	TRADES	RATE	CUNN SHR	TRANS FEE	REBATE
LLT-001	4,540.00	227	1.50	-340.50	640.50	4,840.00
LLT-002	3,780.00	189	1.50	-283.50	471.00	3,967.50
LLT-003	3,780.00	189	1.50	-283.50	475.50	3,972.00
LLT-010			1.50	0.00		0.00
LLT-017	8,450.00	430	1.50	-645.00	1,033.50	8,838.50
LLT-028			1.50	0.00		0.00
LLT-029			1.50	0.00		0.00
LLT-037			1.50	0.00		0.00
LLT-099			1.50	0.00		0.00

## Comm ADJ

Legal Fee Payment	-520.00
Apr ICE Fee	-110.00
write off debit - f9999	-13,907.70
MAY 2019 ERROR ACCOUNT	-855.00

CTS MONTHLY CHARGE	-1,430.90
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w/trf fee - mar 2019	-30.00
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**FINAL REBATE**

**4,764.40**

## LONG LEAF TRADING

June 2019

June 2019

ACCT #	GROSS	TRADES	RATE	CUNN SHR	TRANS FEE	REBATE
LLT-001	7,000.00	350	1.50	-525.00	1,302.00	7,777.00
LLT-002	6,020.00	301	1.50	-451.50	1,136.00	6,704.50
LLT-003	16,415.00	907	1.50	-1,360.50	3,026.00	18,080.50
LLT-010			1.50	* 0.00		0.00
LLT-017	19,270.00	968	1.50	-1,452.00	3,041.50	20,859.50
LLT-028			1.50	0.00		0.00
LLT-029			1.50	0.00		0.00
LLT-037			1.50	0.00		0.00
LLT-099			1.50	0.00		0.00

Comm ADJ

ICE FEES -110.00

write off June 2019 debit - f9999 -3,220.72

CTS MONTHLY CHARGE -1,430.90

w/trf fee - June 2019 -30.00

FINAL REBATE 48,629.88

## LONG LEAF TRADING

July 2019

July 2019

ACCT #	GROSS	TRADES	RATE	CUNN SHR	TRANS FEE	REBATE
LLT-001	2,600.00	130	1.50	-195.00	584.00	2,989.00
LLT-002	2,560.00	125	1.50	-187.50	558.00	2,930.50
LLT-003	10,195.00	594	1.50	-891.00	2,186.00	11,490.00
LLT-010			1.50	0.00		0.00
LLT-017	11,471.30	598	1.50	-897.00	2,280.00	12,854.30
LLT-028			1.50	0.00		0.00
LLT-029			1.50	0.00		0.00
LLT-037			1.50	0.00		0.00
LLT-099			1.50	0.00		0.00

Comm ADJ

ICE FEES	-110.00
write off June 2019 debit - f9999	-4,302.96

CTS MONTHLY CHARGE	-1,430.90
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w/trf fee - July 2019	-30.00
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FINAL REBATE	24,389.94
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## LONG LEAF TRADING

August 2019

use comm

August 2019

ACCT #	GROSS	TRADES	RATE	CUNN SHR	TRANS FEE	REBATE
LLT-001	4,140.00	207	1.50	-310.50	766.00	4,595.50
LLT-002	5,500.00	275	1.50	-412.50	964.00	6,051.50
LLT-003	22,840.00	1331	1.50	-1,996.50	4,970.00	25,813.50
LLT-010			1.50	0.00		0.00
LLT-017	23,270.00	1222	1.50	-1,833.00	4,498.00	25,935.00
LLT-028			1.50	0.00		0.00
LLT-029			1.50	0.00		0.00
LLT-037			1.50	0.00		0.00
LLT-099			1.50	0.00		0.00

## Comm ADJ

ICE FEES	-110.00
write off June 2019 debit - f9999	-111.75

CTS MONTHLY CHARGE	-1,430.90
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w/trf fee - Aug 2019	-30.00
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FINAL REBATE	60,712.85
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## LONG LEAF TRADING

September 2019	use comm	September 2019	
ACCT #	GROSS	TRADES	RATE
LLT-001	3,940.00	197	1.50
LLT-002	5,160.00	258	1.50
LLT-003	20,385.00	1223	1.50
LLT-010			1.50
LLT-017	19,327.00	1031	1.50
LLT-028			1.50
LLT-029			1.50
LLT-037			1.50
LLT-099			1.50

## Comm ADJ

ICE FEES	-110.00
write off June 2019 debit - f9999	-1,194.88
Long Leaf RPM Review	-3,500.00

CTS MONTHLY CHARGE	-1,430.90
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w/trf fee - Aug 2019	-30.00
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FINAL REBATE	48,580.72
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## LONG LEAF TRADING

October 2019	use comm	October 2019	
ACCT #	GROSS	TRADES	RATE
LLT-001	6,060.00	303	1.50
LLT-002	8,100.00	405	1.50
LLT-003	25,805.00	1522	1.50
LLT-010			1.50
LLT-017	29,301.00	1533	1.50
LLT-028			1.50
LLT-029			1.50
LLT-037			1.50
LLT-099			1.50

October 2019	
CUNN SHR	TRANS FEE
-454.50	1,032.00
-607.50	1,384.00
-2,283.00	5,280.00
0.00	
-2,299.50	5,224.00
0.00	
0.00	
0.00	
0.00	

REBATE
6,637.50
8,876.50
28,802.00
0.00
32,225.50
0.00
0.00
0.00
0.00

## Comm ADJ

ICE FEES	-110.00
write off June 2019 debit - f9999	-30.00

CTS MONTHLY CHARGE	-1,430.90
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w/trf fee - Aug 2019	-30.00
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FINAL REBATE	74,940.60
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## LONG LEAF TRADING

November 2019	use comm	November 2019	
ACCT #	GROSS	TRADES	RATE
LLT-001	142.00	73	1.50
LLT-002	3,780.00	189	1.50
LLT-003	18,280.00	1130	1.50
LLT-010			1.50
LLT-017	17,414.00	930	1.50
LLT-028			1.50
LLT-029			1.50
LLT-037			1.50
LLT-099			1.50

November 2019	
CUNN SHR	TRANS FEE
-109.50	454.00
-283.50	828.00
-1,695.00	3,962.00
0.00	
-1,395.00	3,512.00
0.00	
0.00	
0.00	
0.00	

REBATE
486.50
4,324.50
20,547.00
0.00
19,531.00
0.00
0.00
0.00
0.00



Comm ADJ

ICE FEES

-110.00

write off Nov 2019 debit - f9999

-7,057.98

CTS MONTHLY CHARGE

-1,430.90

w/trf fee

-30.00

FINAL REBATE

36,260.12